

**Before the  
Federal Communications Commission  
WASHINGTON, D.C. 20554**

|   |   |                      |
|---|---|----------------------|
| In the Matters of   | ) |                      |
|   | ) |                      |
| Connect America Fund  | ) | WC Docket No. 10-90  |
|   | ) |                      |
| A National Broadband Plan for Our<br>Future                           | ) | GN Docket No. 09-51  |
|   | ) |                      |
| Establishing Just and Reasonable Rates<br>For Local Exchange Carriers | ) | WC Docket No. 07-135 |
|   | ) |                      |
| High-Cost Universal Service Support                                   | ) | WC Docket No. 05-337 |
|   | ) |                      |
| Developing a Unified Intercarrier<br>Compensation Regime              | ) | CC Docket No. 01-92  |
|   | ) |                      |
| Federal-State Joint Board on<br>Compensation Regime                   | ) | CC Docket No. 96-45  |
|   | ) |                      |
| Lifeline and Link-Up  | ) | WC Docket No. 03-109 |
|   | ) |                      |
| Universal Service Reform – Mobility Fund                              | ) | WT Docket No. 10-208 |

**COMMENTS OF PENINSULA FIBER NETWORK, LLC**

We agree with CenturyLink that there appears to be considerable confusion within the industry regarding the tariffing and implementation of Steps 6 and 7 of the CAF Order transition. We understand that the FCC was providing guidance to the Price Cap LECs on Step 6/7 tariffing/implementation and that guidance, as described by CenturyLink in its Petition, raises additional questions for Peninsula Fiber Network. The guidelines, as far as they go, could result in disparate treatment between incumbent and competitive tandem/transport providers. At the same time, the guidelines do raise important questions about Steps 6 and 7 – and the future of the tandem/transport market.

As the FCC is aware, different regulatory interpretations when it comes to intercarrier compensation lead to costly, drawn-out billing disputes and disruption of important revenue flows. Additionally, well-intentioned guidelines that are issued to shore up what some think are unclear rules have the potential of shaping a market in unintended ways that hinder rather than foster competition.

These problems could be avoided by granting the limited stay and formally, and more fully, addressing the appropriate treatment of the tandem/transport before lifting the limited stay.

Respectfully submitted,

/s/ David McCartney

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